

## NELSON GALVANIZING INC.

11-02 BROADWAY  
LONG ISLAND CITY, N. Y. 11106

340382



April 26, 1990

Mr. Sudhir H. Jagirdar, P.E.  
Regional Hazardous Substances Engineer  
New York State Department of Environmental Conservation  
Hunter's Point Plaza  
47-40 21st Street  
Long Island City, New York 11101  
ATT: Mr. Sam Arakhan, Inspector

Dear Sirs:

This letter is in response to the Hazardous Waste Compliance violations cited in your letter to Nelson Galvanizing on January 24, 1990. Nelson's E.P.A. I.D. number is NYD001229350.

REF: 6NYCRR Part 373-1.1 (d) (1)(iii): The material cited that we have stored on the premises is the effluent from the previous cleaning tanks (both sulfuric acid ( $H_2SO_4$ ) 5% concentration, and sodium hydroxide ( $NaOH$ ) 10% concentration). These in-ground concrete tanks had to be replaced at the behest of the NYCDEP. Since then, Nelson has installed concrete pads and above ground cleaning tanks to replace the old ones. None of the original tanks remain. In the mean time, the material from these old tanks has been marked, although we do not classify it as waste per se. We have been using this material in addition to the present cleaning solution in our tanks. Implementing the old solution a little at a time, we have used up approximately 50% of the original material.

Nelson does not believe that it should be classified as a "generator of hazardous waste," since we have not generated any more of this material, and in fact are reducing the amount of the previously cited material. We further believe that we will not become a future generator of waste because we have learned how to remove the iron salts (ferric sulfate) from

## NELSON GALVANIZING INC.

11-02 BROADWAY  
LONG ISLAND CITY, N. Y. 11106EPA ID# NYD001229350  
Page 2

the cleaning solution. These salts are the only reason our acid cleaning solution would not last indefinitely. With proper management of the iron salts, we may not have to dispose of any acid solution at all. If, on the other hand, we do want to dispose of any of our acid solution, we have contracted Chemical Waste Management Inc. who has sampled and analyzed our acid solution for removal treatment. They have the accreditation, capability, and permits to remove, haul, and dispose of this material in Vicksburg, Ohio.

Ref:372.2(c): A copy of each annual report and exemption report will be filed and kept on record for a period of three years.

Ref:372.2(b)(2)(ii): Three shipments of spent acid have been removed by Chemical Pollution Control Inc., Bay Shore, N.Y. NYCDEP was informed of these shipments and the manifests are on file at the plant.

Ref:373.-3.2(g)(4): Plant Manager John Sweeney is responsible for all chemical purchases, handling, and storage; including material that may be deemed hazardous waste.

Mr. Sweeney is a University graduate with several courses in chemistry, and has garnered extensive knowledge in chemical management through twenty seven years in the business and who continues to familiarize himself through updates from both

# NELSON GALVANIZING INC.

11-02 BROADWAY  
LONG ISLAND CITY, N. Y. 11106

EPA ID# NYD001229350  
Page 3

manufacturers and trade publications.

As part of his job, the Plant Manager is responsible for making sure chemicals are handled properly, and that storage and processing containers are properly closed and maintained.

Ref: 373-3.2 (g)(1)(2)(3): Mr. Moses Bailey, the "Plant Maintenance Supervisor" has over 40 years of chemical handling safety experience. He holds a "Certificate of Fitness" from the NYC Fire Dept. for the handling and storage of acid which was awarded upon completion of an extensive training and examination course. The Certificate is on file at the plant.

Mr. Lionell Joseph is our Night Foreman and has over 30 years of experience with chemical handling procedures. Mr. Joseph also holds a "Certificate of Fitness" for the handling and storage of acid. The certificate is on file at the plant.

Ref: 373-3.2 (g)(5): All training records and certificates of fitness are on file at the facility.

Ref: 373-3.2 (g)(5):(b) Fire: N/A

Explosion: N/A

In 1988, in-ground concrete processing tanks were replaced by above-ground polypropylene processing tanks especially designed for this type of chemical processing. These tanks are set on a concrete pad 8" thick which will effectively

# NELSON GALVANIZING INC.

11-02 BROADWAY EPA ID# NYD001229350  
LONG ISLAND CITY, N. Y. 11106 Page 4

prevent any accidental spill from reaching beyond the pad into the ground surface. A raw 3000 gallon acid storage tank has been padded, cradled and diked according to NYC Fire Dept. specifications. Acid storage permit pending.

Ref: 373-3(f): Aisle spacing has been upgraded. We have been inspected by the NYCFD and OSHA and have incurred no violations for inadequate aisle spacing.

Spill Control - neutralizing agents for both acid and alkali are readily available in case of spills. Emergency equipment, including rubber boots, aprons, gloves, face shields, shovels and pumps are on hand at all times. An emergency shower is planned and full showers are available on the premises.

Ref: 373-3(G) (1): The NYC Fire Dept. regularly inspects the facility and has a schematic of the plant, highlighting all chemical processing and storage areas.

Astoria General Hospital has been handling any emergency cases we've had for the past 30 years and is thoroughly familiar with our operation. Their emergency rooms are equipped to handle any possible chemical burns or injury.

Ref: 373-3.4(B)(1) and (C)(1): A contingency plan is on file at the facility.

# NELSON GALVANIZING INC.

11-02 BROADWAY EPA ID# NYD001229350  
LONG ISLAND CITY, N. Y. 11106 Page 5

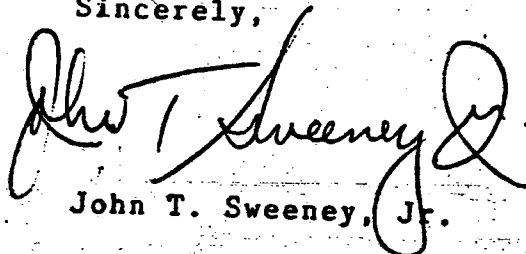
Ref: 373-3.4(d)(2): A copy of the contingency plan will be submitted to our local NYCFD, NYCPD, and Astoria General Hospital (locals).

Enclosed also is a copy of our Emergency Contingency Plans.

If you have any further questions or comments, please contact

Plant Manager John T. Sweeney at (718) 728-0880. Thank you.

Sincerely,



John T. Sweeney, Jr.

JTS/jt

ENCL